

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, LUKE LOE, RICHARD ROE, and  
MARY MOE, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

*v.*

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity, DONALD  
TRUMP JR., ERIC TRUMP, and IVANKA  
TRUMP,

*Defendants.*

Case No.: 1:18-cv-09936 (LGS)

**DECLARATION OF NICK BOURLAND IN SUPPORT OF PLAINTIFFS’  
MOTION TO COMPEL NON-PARTY ACN OPPORTUNITY, LLC**

NICK BOURLAND, an attorney duly admitted to practice in the Southern District of New York, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am associated with the law firm of Emery Celli Brinckerhoff & Abady LLP, attorneys for Plaintiffs Jane Doe, Luke Loe, Richard Roe, and Mary Moe.
2. I respectfully submit this Declaration in support of Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion to Compel Non-Party ACN Opportunity, LLC (“ACN”).
3. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs’ September 6, 2019 Subpoena *Duces Tecum* to ACN.
4. Attached hereto as Exhibit B is a true and correct copy of non-party ACN’s Objections and Responses to Plaintiffs’ Subpoena *Duces Tecum*.

5. Attached hereto as Exhibit C is a true and correct copy of non-party ACN's Proposed Revised Non-Disclosure Agreement.

Dated: January 31, 2020  
New York, New York

/s/  
NICK BOURLAND